

REMARKS

Reconsideration of the present application, as amended, is respectfully requested.

By means of the present amendment, the current Abstract has been deleted and substituted with the enclosed New Abstract which better conforms to U.S. practice.

In the Office Action, claim 3 was objected to for certain informalities. In response, claim 3 has been amended in accordance with the Examiners suggestions. Accordingly, withdrawal of the objection to claim 3 is respectfully requested.

In the Office Action, claim 2 was rejected under 35 U.S.C. §112, second paragraph, as being indefinite. In response, claim 2 has been amended to clarify the informalities noted by the Examiner. It is respectfully submitted that amended claim 2 particularly points out and distinctly claim the subject matter which applicants regard as the invention. Accordingly, withdrawal of the rejection to claim 2 under 35 U.S.C. §112, second paragraph, is respectfully requested.

In the Office Action, claims 1-3 were rejected under 35 U.S.C. §103(a) as being unpatentable over Miro et al. IEEE Publication, 1997, "A VLSI Architecture for Image Geometrical Transformation

Using an Embedded Core Based Processor" (Miro), and further in view of Edirisinghe et al., IEEE Publication 2000, "Shape Adaptive Padding for MPEG-4" (Edirisinghe). Applicants respectfully traverse this rejection to claims 1-3 and submit that claims 1-3 are patentable over Miro and Edirisinghe for at least the following reasons.

Miro is directed to a circuit for geometric transformation of pictures. A backward mapping technique is used to process the geometric transformation, where source image coordinates x, y are calculated from corresponding coordinates X, Y of a resulting image called the destination image. In the Office Action, the destination image is analogized with the image in the arrival space of the present invention, and based thereon, it is alleged that Miro meets the feature of computing a zone in the departure space by applying inverse geometric transformation to a zone of an arrival space. Without agreeing with this allegation, Applicants reserve the right to argue this point at a later time.

As correctly noted by the Examiner, Miro does not teach or suggest establishing a group of Boolean values for the zone of departure space and composing the group of image samples from the group of input values, as recited in claims 1-3. Edirisinghe is

cited in an attempt to remedy these deficiencies in Miro.

Edirisinghe is directed to shape distortion adaptive hybrid padding technique that minimize prediction errors and improve compression efficiency. On page 4 of the Office Action, it is noted that Edirisinghe teaches to code "only motion and texture information for the macro-blocks belonging to the VOP image", where it is alleged that this meets the limitation of "composing the group of image samples [TL] from the group of input values [IV], the Boolean values [BV] preventing the input values designated as being non-valid from contributing to an image sample," as recited in claim 1 with similar features in claims 2-3.

It is respectfully submitted that there is no teaching or suggestion in Edirisinghe and Miro, alone or in combination, of "composing the group of image samples [TL] from the group of input values [IV]", where the group of input values [IV] are established for the zone in the departure space, as recited in claim 1 with similar features in claims 2-3. (Emphasis added)

Further, it is submitted that the combination of Miro and Edirisinghe is not proper since there is simply no suggestion or motivation to combine them. Assuming, *arguendo*, that this combination is proper, the result would be modifying the


Miro circuit for geometric transformation of pictures (where backward mapping technique is used to process the geometric transformation) by using motion and texture information as taught by Edirisinghe. Such a combination still does not teach or suggest "composing the group of image samples [TL] from the group of input values [IV]", as recited in claim 1 with similar features in claims 2-3. (Emphasis added). Accordingly, it is respectfully submitted that claims 1-3 be allowed.

In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

If any informalities remain, the Examiner is requested to telephone the undersigned in order to expedite allowance.

Please charge any fee deficiencies and credit any overpayments
to Deposit Account No. 14-1270.

Respectfully submitted,

By 
Dicran Halajian, Reg. 39,703
Attorney
(914) 333-9607
February 9, 2005

Enclosure: New Abstract

CERTIFICATE OF MAILING

It is hereby certified that this correspondence
is being deposited with the United States Postal Service
as first-class mail in an envelope addressed to:

COMMISSIONER FOR PATENTS
P.O. BOX 1450
ALEXANDRIA, VA 22313-1450

On February 9, 2005
(Date of Mailing)
By Natalie Q. Marzo
(Signature)